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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CHEYENNE LOLA JULIAN,)	Case No.: 2:22-CV-01775-AC
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from April 17, 2023, up to and including May 17, 2023. This is the Defendant's first request for an extension.

Defendant requests this extension in order to further consider the 1,420 page administrative record in light of the three issues raised in Plaintiff's motion. Counsel for Defendant has not been dilatory. Since March 3, 2023, when Plaintiff filed her Motion for Summary Judgment, counsel for Defendant has filed seven briefs and completed one negotiated settlement. Counsel for Defendant has another seven outstanding briefs to be filed in the next thirty days.

1 The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

3 Respectfully submitted,

4 Dated: April 12, 2023

/s/ Francesco Benavides*
(*as authorized via e-mail on Apr. 12, 2023)
FRANCESCO P. BENAVIDES
Attorney for Plaintiff

7 Dated: April 12, 2023

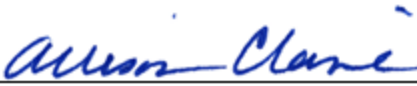
8 PHILLIP A. TALBERT
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11 By: /s/ Zachary Berkoff-Cane
12 ZACHARY BERKOFF-CANE
Special Assistant U.S. Attorney
13 Attorneys for Defendant
14

15 **ORDER**

16 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
17 extension, up to and including May 17, 2023, to respond to Plaintiff's Motion for Summary
18 Judgment.

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20 DATED: April 12, 2023


21 ALLISON CLAIRE
22 UNITED STATES MAGISTRATE JUDGE
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